

Specifications for Text PDF Product Labels revised 5/12/03

NOTE: The following guidance is provided for creating and submitting product labels in electronic format to EPA. Registrants are requested to adhere to the guidance where reasonably possible but some variation is permissible. Questions, comments, and suggestions are welcome and should be emailed to Harris.Thomas@EPA.gov. Check the EPA website periodically for updates to this guidance.

Feature	Specification	
Software	Any word processing or desktop publishing software.	<p>One of EPA's goals in selecting PDF as the standard text exchange format is to allow registrants to use almost any software to create original product label.</p> <p>Note: The PDF and CD-ROM submitted to EPA must be formatted for Microsoft® Windows® (95 or higher). Format conversion software may be needed if original document is from MacIntosh®, Unix®, et al.</p>
Label version identification	Recommended: Include a unique label identifier (version code) and short description of changes at start or end of label. Version code can be used on final printed label; description of changes should not appear on the final printed label.	<p>In addition to the unique file name used for the PDF submitted to EPA (see below) it is recommended that each version of a label include a unique identifier and short description of the changes. The goal is to distinguish the document from other versions of the label. For example, the last page of the label could state a company version code (or simply date created) plus a chronology of recent changes to the label. This label version identification information is for processing purposes only. It may be useful to print the version code on final printed labeling but any text description should not be appear on the final printed labeling.</p>

Feature	Specification	
Paper size	8.5" x 11"	
Paper orientation	portrait or landscape	
Margins	Preferred: 1" all sides Minimum: <ul style="list-style-type: none"> • portrait - 1" left and bottom; 0.3" top and right • landscape - 1" top and bottom; 0.3" left and right 	Directions are relative to orientation, i.e. top of portrait is 8.5", top of landscape is 11". Wider margins are required on binding edge (documents are filed in portrait binders) and on bottom (to allow for EPA stamping).
Font Size	12 point preferred 6 point minimum	Follow label requirements in 40CFR156 and Label Review Manual regarding minimum font sizes for various components of label.
Font Type & Style	True Type® or Postscript® Type 1 Times New Roman or Arial preferred	Do NOT use proprietary fonts. These can not be embedded in PDFs. Acrobat will try to use a substitute font but this may alter document appearance. When converting to PDF, embed all fonts used in document to ensure correct formatting, appearance, and printing of document. It is recommended that the PDF be created on the same computer on which the original source document was created so the same non-proprietary fonts are available. Using the "when embedding fails - cancel job" option will make it obvious when font problems exist (often due to proprietary fonts).

Feature	Specification	
Page Numbering	Number all pages.	Page numbers are extremely helpful and should be included in label submitted for OPP approval.
Tables	Use software "table" function rather than tabs or blank spaces to create tabular layout.	Tabular text initially created in true tables and then converted to PDF readily exports to other software. Use of tabs to create the look of a table does not result in readily exportable data.
Color	Text: black Graphics: grey scale preferred	Regulatory labels are frequently photocopied in black/white. While colors may be used they should not interfere with ability to read or photocopy the label.
Graphics	Logos, drawings, diagrams, photographs, etc. are allowed if they do not interfere with text.	Any required label text within or surrounding graphics must be readable as text by the computer. See tip on checking for text versus graphics under "Quality Assurance" below.
Editing Marks	Do NOT include redline/strikeout or other editing markup. Exception: Can use square brackets to indicate text aside from legal label.	Electronic label should be based on a "clean" version of the proposed label. Do not use a version containing strikeout, redline, or other editing marks to indicate changes from previous version of label to create PDF. Square brackets can be used to indicate text not part of actual label (e.g. notes to EPA reviewer) or notes concerning text to be inserted in final printed label (eg. company web site URL).

Feature	Specification	
Software	<p>Preferred: Use any software that can create a PDF version 1.4 or higher and which can control the required job options specified in this document.</p>	<p>To check software and version, user can open finished PDF product label in Adobe® Acrobat®. Check the following under File/Document Properties/Summary:</p> <ul style="list-style-type: none"> • Creator - any software; often tied to software used to create original source product label (e.g. PDF Maker® for Microsoft® Word®). • Producer - any software (e.g. Acrobat® Distiller® 5.x (or higher)) • PDF Version - 1.4 (Acrobat® 5.x) or higher <p>It is recommended that you do NOT use PDFWriter®. This produces an older version of PDF files. Adobe® is no longer supporting this output tool.</p>
File Format	<p>Preferred: Adobe® Portable Document Format (PDF) - Version 1.4 or higher for IBM type computer.</p>	<p>Labels in older PDF versions may still be acceptable to EPA (under evaluation). Note that software creating older PDF versions may not be able to set all the options specified below (e.g. security).</p>
PDF File Compatibility	<p>Adobe® Acrobat® 5.0 or higher</p>	<p>EPA staff will use Adobe® Acrobat® 5 (full program) to perform label comparison and review annotation.</p>

Feature	Specification	
Conversion to PDF	<p>PDF must be created directly from electronic source document.</p> <p>DO NOT SCAN PAPER LABELS (with or without optical character recognition).</p>	<p>Goal is to create text PDF rather than image PDF to allow indexing, searching, text comparison, etc. Do not submit scanned labels. This is different than conversion of data studies to PDF where scanning is a last resort option.</p>
Adobe® Acrobat® Distiller® Job options	<p>Use Agency supplied downloadable <u>Job Options File for Product Labels</u> or manually configure job options using the settings in this document. More details can be found in <u>Software Settings for the Creation of PDF Files for Electronic Submission</u>.</p>	<p>Directions in this document apply to Adobe® Acrobat® Distiller® in the creation of the product label PDF file. If using other software you may need to consult that program's documentation to determine how to achieve these results.</p>
Compatibility	<p>Set job options to:</p> <ul style="list-style-type: none"> • Adobe® Acrobat® 5.0 (PDF 1.4) 	<p>This may not be the default setting. Be sure to check.</p>
Font Embedding	<p>Set job options to:</p> <ul style="list-style-type: none"> • Embed all fonts • Do not select "subset embedded fonts" • When embedding fails: cancel job 	<p>Goal is to embed all fonts used in document to ensure correct formatting, appearance, and printing of document. It is recommended that the PDF be created on the same computer on which the original source document was created so the same non-proprietary fonts are available. Using the "when embedding fails - cancel job" option will make it obvious when font problems exist (often due to proprietary fonts).</p> <p>Do NOT use proprietary fonts. These can not be embedded in PDFs. Acrobat will try to use a substitute font but this may alter document format, appearance, and print.</p>

Feature	Specification	
Security	Set the following security settings: Permissions: <ul style="list-style-type: none"> Allow content copying and extraction Changes allowed: <ul style="list-style-type: none"> Comment authoring, form field fill-in or signing Printing: <ul style="list-style-type: none"> Fully allowed 	Goal is to enable comparison of PDF files, annotation of required changes on PDF file, and printing. Note: Security options may change in future.
Page Size	8.5" x 11"	
Margins	Same as source document.	
Page Orientation	Same as source document.	
Page Numbering	Same as source document.	
Bookmarks - Product Label	Optional.	If used, it is recommended that registrant bookmark the major label sections and bookmark the crops/sites.
Bookmark Hierarchy	Limit to no more than four levels in either full submission or within a single document.	Consensus is that people get 'lost' when there are more than four levels.
Indexing	Not required at this time.	This includes both the data in File/Document Properties/Summary as well as indexing using the Adobe® Acrobat® cataloging capability.
Electronic Signatures	Not implemented at present	Electronic submissions must include <u>Certification with Respect to Label Integrity</u> pending development of Agency policy and standards on electronic signatures.

Feature	Specification	
Mixing Data files and Label files	Product label must be in its own file (see file naming convention below) separate from data studies or forms. Product label file must be in a directory called "Label".	Labels can be submitted along with full electronic submission including forms, data, and label. However, label must be in a separate PDF file so that it can be copied into an EPA label database. The label file should in a directory called "Label" so it is easy to find. Submission PDF can include a hyperlink to label file.
File Size	No limit	PDF has no limit on file size but the computer used to create or read the file may introduce constraints.

Feature	Specification
File Naming Convention - Product Label	<p>Finished PDF text label file MUST use this file name format:</p> <p style="text-align: center;"><co#>-<prod#>.<yyyymmdd><version>.<optional-id>.PDF</p> <p>where:</p> <ul style="list-style-type: none"> <co#> = 6 digit company number part of registration number; use leading zeros so that field is 6 digits - = mandatory dash symbol <prod#> = 5 digit product sequence number part of registration number; use leading zeros so that field is 5 digits; for new products which do not yet have product numbers assigned use "xxxxx" in this field . (period) = mandatory field separator <yyyymmdd> = date of submission using 4-digit year; use leading zeros for month and day, if needed; note that order is year, month, day to facilitate simple sorting¹ <version> = optional version identifier <i>if needed to distinguish file versions with same date field</i>; consider initial submission to be version "a" but do not include the "a" in the file name; if needed, the first version identifier used in the file name would therefore be "b"; use letters (b, c, d, etc); do NOT separate version from date with period or space . (period) = mandatory field separator <optional-id> = optional descriptor; any additional useful information (reason for amendment, company's document identifier, product name, etc); can include several fields separated by periods if desired² . (period) = mandatory field separator PDF = mandatory file extension <p>Note: use leading zeros to fill co#, prod#, and yyyymmdd fields</p>

Feature	Specification
File Naming Convention - Product Label (continued)	<p>¹ Note: Date can be either date the product label is submitted or created. It is not critical which date is used but "<yyyymmdd><version>" MUST create a unique identification code different from any other file for this registration number. Preference is to use submission date from EPA form 8570-1 with version letter indicating any further revisions to label sent to EPA while that label decision is open and being reviewed by EPA.</p> <p>² Note: Full path and file name is limited to 200 characters although some older software may have problems displaying names longer than 60 characters.</p> <p>examples:</p> <p> minimum fields 001234-00123.20010215.PDF</p> <p> all fields 123456-12345.20000919b.celery.PDF</p>

Feature	Specification	
Quality Assurance	<p>Print the PDF product label and compare to original source print.</p> <p>It is suggested that printed PDF product labels be used for the paper copies of label required for submission.</p> <p>Check PDF file to make sure label is text, not graphic.</p>	<p>It is registrant's responsibility to make sure that the PDF label matches the original source label. Do not assume PDF is accurate without visually checking it. Errors are usually obvious in terms of formatting (e.g. last line of original source page moves to first line of next page in PDF version) or fonts that will not print correctly (usually due to use of proprietary fonts). Be sure to look at start and end of each page and to look at any unusual symbols, fonts, or graphics included in label.</p> <p>Using a print of the PDF label (rather than print of original source document) will help registrant ensure that the submitted paper label is the same as the submitted electronic label as stated on the <u>Certification with Respect to Label Integrity</u>.</p> <p>To check if label is text or graphic, open PDF label in full Adobe® Acrobat® and try to select text using the "text select" tool. If words can be highlighted with text select tool then you are working with text PDF; if they can not be selected then you probably have a graphic (image). The text select tool highlights a word at a time; the graphic select tool highlights rectangular areas so that you can split words, lines, and letters.</p>

Feature	Specification	
What to Submit	<ol style="list-style-type: none"> 1. All required paperwork (cover letter, form 8570-1, data compensation, CSF, etc. as needed). 2. Five paper copies of the label. 3. PDF file of proposed product label on CD-ROM. 4. <u>Certification with Respect to Label Integrity</u> form (signed). 	<p>Label formats: Submit five paper copies of the proposed label plus one electronic copy of the proposed label. It is suggested that you print the paper copies from the electronic PDF. You may also include an optional paper copy of the label with redline/strikeout or similar editing marks showing changes since last version (although this is not necessary when electronic labels are available for comparison) but do NOT use this mark-up version when creating the PDF label.</p> <p>Electronic label file name: Label files MUST use file name format specified in this document since the file is automatically copied into a database record identified by parts of this file name. If label files are incorrectly named the submission will be rejected and returned to the registrant for correction.</p> <p>Certification form: Use one form per product even if multiple product labels sent on same CD-ROM to accompany concurrent paper submissions.</p>
Submission Medium	Compact Disk (CD-ROM).	CDR (write once) type CD-ROM is preferred to ensure that the registrants files can not be altered. The PDF and CD-ROM submitted to EPA must be formatted for Microsoft® Windows® (95 or higher). Format conversion software may be needed if original document is from MacIntosh®, Unix®, et al. Do not submit floppy disks.

Feature	Specification	
Mixing Data files and Label files on same CD-ROM	Product label must be in its own file (see file naming convention above) separate from data studies or forms. Product label file must be in a directory called "Label".	Labels can be submitted along with full electronic submission including forms, data, and label. However, label must be in a separate PDF file so that it can be copied into a label database. The label file should in a directory called "Label" so it is easy to find. Full path and file name is limited to 200 characters (some older software may have problems displaying more than 60 characters). Submission PDF can include a hyperlink to label file.
Labeling of CD and Jewel Case	<p>If submitting only label(s): Registrant, Product number(s), brief description (optional) on both CD and case</p> <p>If submitting label(s) along with data files: Registrant, Active Ingredient, brief description on both CD and case.</p>	<p>If submitting only label(s): Can put labels for multiple products on same CD if accompanying concurrent paper submissions.</p> <p>If submitting label(s) along with data files: Put only one product submission per CD. However, multiple CDs may be used for one product submission, if necessary.</p>
How & Where to Submit	<p>Send via courier service to OPP physical location:</p> <p>Document Processing Desk (E-SUB) U.S. EPA - Office of Pesticide Programs Room 266A 1921 Jefferson Davis Hgwy. Arlington, VA 22202</p>	Do NOT send via US mail. The irradiation procedures currently used on Washington, DC mail will damage the CD-ROM.